



Early Journal Content on JSTOR, Free to Anyone in the World

This article is one of nearly 500,000 scholarly works digitized and made freely available to everyone in the world by JSTOR.

Known as the Early Journal Content, this set of works include research articles, news, letters, and other writings published in more than 200 of the oldest leading academic journals. The works date from the mid-seventeenth to the early twentieth centuries.

We encourage people to read and share the Early Journal Content openly and to tell others that this resource exists. People may post this content online or redistribute in any way for non-commercial purposes.

Read more about Early Journal Content at <http://about.jstor.org/participate-jstor/individuals/early-journal-content>.

JSTOR is a digital library of academic journals, books, and primary source objects. JSTOR helps people discover, use, and build upon a wide range of content through a powerful research and teaching platform, and preserves this content for future generations. JSTOR is part of ITHAKA, a not-for-profit organization that also includes Ithaka S+R and Portico. For more information about JSTOR, please contact support@jstor.org.

impeachment may not be used when the witness is a non-expert, *Loring v. Warren County*, 1 Ky. L. Rep. 340; *People v. Patrick*, 182 N. Y. 131, but that it is admissible when he is a handwriting expert, *Browning v. Gosnell*, 91 Ia. 448; *Hoag v. Wright*, 174 N. Y. 36. Still others hold that it is inadmissible in either case, basing their holding upon the ground that comparisons may be made only with admittedly genuine signatures upon direct examination, and that the same rule is applicable to cross-examination. *Gaunt v. Harkness*, 53 Kan. 405; *Fourth National Bank of Fayetteville v. McArthur*, 84 S. E. 39; ROGERS, *EXPERT TESTIMONY* (2d ed.) p. 342, § 144. In the light of the various views which different courts have taken of the subject, it is difficult to determine where the weight of authority lies, but reason and expediency would seem to be with those courts which permit the handwriting expert so to be impeached, and against the holding in the principal case. *Hoag v. Wright*, 174 N. Y. 36.

GIFTS—EXPECTANT ESTATE IN PERSONALTY.—Where the owner of shares of stock gives a certificate for a number of these shares to a third person, with instructions to deliver the same to his daughter, only in case of his death, *held*, that such transaction creates an expectant estate in personal property. *Innes v. Potter* (Minn. 1915) 153 N. W. 604.

Under § 3213 of MINN. REV. ST. 1905, authorizing a freehold estate as well as chattels real to be created commencing at a future day, deeds of real estate granted in the manner of the principal case have long been held to vest complete title in the grantee after the death of the grantor. *Haeg v. Haeg*, 53 Minn. 33, 35 N. W. 114; *Wicklund v. Lindquist*, 102 Minn. 34, 113 N. W. 631; *Dickson v. Miller*, 124 Minn. 346, 145 N. W. 112. In early times expectant estates in personalty were unknown because of such property's changeability and comparative insignificance. But the present trend of development, both in England and the United States, is toward a general recognition of future estates in personalty with an evident disregard for all prior imposed limitations and restrictions, the estate being held good whether made by will or by deed and whether the goods or merely the use of the goods be given to the first legatee. 2 KENT, COM. (13th Ed.) 352, 353 and notes: *Longworthy v. Chadwick*, 13 Conn. 42. The principal case brings Minnesota into accord with what seems to be the settled law of most jurisdictions: namely, that the donor may create a valid expectant estate in personalty, by gift made absolute by delivery to some third person, the right of enjoyment in the donee being postponed until after the death of the donor. *Grand Trust and Savings Co. v. Tucker*, 49 Ind. App. 345, 96 N. E. 487; *Tucker v. Tucker*, 138 Iowa 344, 116 N. W. 119; *Meriwether v. Morrison*, 78 Ky. 572; *Greene v. Tulane*, 52 N. J. Eq. 169, 28 Atl. 9.

HUSBAND AND WIFE—ALIENATION OF AFFECTIONS—LIABILITY OF RELATIVES.—The defendants who were the parents, brothers and sisters of the plaintiff's wife made threats upon the life of the plaintiff and informed his wife that she "must choose between them and him," wherefore the plaintiff's wife was induced to abandon him. Plaintiff was unobjectionable as a husband, and the only apparent reason for the interference by the relatives was the fact that